

## **EXHIBIT B**

Matthew R. Lewis (7919)  
Taylor J. Smith (17537)  
**KUNZLER BEAN & ADAMSON, PC**  
50 W. Broadway, 10th Floor  
Salt Lake City, Utah 84101  
Telephone: (801) 994-4646  
[mlewis@kba.law](mailto:mlewis@kba.law)  
[tsmith@kba.law](mailto:tsmith@kba.law)

Jason P. Gottlieb (admitted *pro hac vice*)  
David E. Ross (admitted *pro hac vice*)  
Alexander R. Yarm (admitted *pro hac vice*)  
**MORRISON COHEN LLP**  
909 Third Avenue, 27<sup>th</sup> Floor  
New York, New York 10022  
Telephone: (212) 735-8600  
[jgottlieb@morrissoncohen.com](mailto:jgottlieb@morrissoncohen.com)  
[dross@morrissoncohen.com](mailto:dross@morrissoncohen.com)  
[ayarm@morrissoncohen.com](mailto:ayarm@morrissoncohen.com)

*Attorneys for Defendants Digital Licensing Inc., Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an

**PROPOSED ORDER REGARDING  
TRANSITION FROM TEMPORARY  
RECEIVER JOSIAS N. DEWEY TO  
DEFENDANTS**

Case No. 2:23-cv-00482-RJS  
Chief Judge Robert J. Shelby

individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

This matter came before the Court upon certain Defendants’ and Relief Defendants’ Motions, *inter alia*, to Dissolve the Temporary Restraining Order (Dkt. 132, 145, 159).

For the reasons stated on the record at the Motion Hearing held on October 6, 2023, the Court, *inter alia* (a) granted the Motions to Dissolve (Dkt. 132, 145, 159) and dissolved the Temporary Restraining Order (Dkt. 165); (b) denied as moot the Motion to Appoint a new Receiver (Dkt. 132); (c) because there is no Temporary Restraining Order in place, the Court concluded the Receivership should not continue beyond a transition period and, accordingly,

denied as moot the SEC's and the Receiver's Motions to Clarify the Receivership Order (Dkt. 125, 144) and the Receiver's Motion for Contempt and Sanctions (Dkt. 138); and (d) directed Morrison Cohen LLP ("Morrison Cohen"), counsel for certain Defendants and Relief Defendants, to meet and confer with other Defense counsel to coordinate a transition plan with respect to the Receiver, to serve that plan on the Receiver, and to meet and confer with the Receiver (Dkt. 187).

Morrison Cohen having met and conferred with other Defense counsel and the Receiver, and having served this proposed order on the Receiver, IT IS HEREBY ORDERED that:

- A. The Receiver shall immediately relinquish control over Digital Licensing Inc. ("DLI"), including all other entities the Receiver deemed subsidiaries or affiliates of DLI or otherwise purported to act for in connection with this action.
- B. The Receiver shall immediately turnover all assets, property, information, documents and communications, whether internal or external, including text messages and emails, the Receiver has obtained, whether by subpoena or otherwise, generated or taken possession, custody or control of in connection with his appointment as Receiver for DLI. This expressly includes, but is not limited to, turning over all digital assets that the Defendants represented by Morrison Cohen previously transferred to the Receiver from wallets and exchange accounts identified in the wallet inventory spreadsheets provided to the Receiver by Morrison Cohen on August 17 and August 22, 2023 and all documents and communications obtained by the Receiver from the law firm Dentons LLP.
- C. On or before, October 19, 2023, the Receiver shall provide an itemized report and accounting to the Defendants represented by Morrison Cohen setting forth in detail all

actions taken by the Receiver following his appointment as Receiver for DLI, including, but not limited to, all assets, documents, email accounts, subpoenas, requests for information, bank accounts, account login credentials, digital asset wallets or accounts, financial information or other property or information that the Receiver has issued, obtained or taken possession, custody or control of since his appointment as Receiver for DLI, as well as ongoing litigation the Receiver has appeared in or acted in connection with, key dates with respect to the same, and all parties, counsel, service providers and vendors the Receiver has contacted or otherwise interacted with in connection with this action.

- D. The Receiver shall cooperate with Defendants and their counsel in order to effect the dissolution of the Receivership, timely turnover all items encompassed by Point B above and transition control of DLI.

IT IS HEREBY FURTHER ORDERED that, due to the Court's dissolution of the Temporary Restraining Order, all Orders stipulated to by any of the Defendants and the SEC in connection with the Temporary Restraining Order are moot and hereby dissolved, including the following:

- a. Temporary Order Regarding Living Expenses for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon and Roydon B. Nelson (Dkt. 120);
- b. Temporary Order Regarding Defendant Travis Flaherty's Living Expenses for Defendant Travis Flaherty (Dkt. 113);

- c. Temporary Order Regarding Defendants Joseph A. Martinez and iX Global, LLC Living Expenses for Defendants Joseph A. Martinez and iX Global LLC (Dkt. 129); and
- d. Stipulated Order Regarding Living Expenses for Defendant Matthew Fritzsche (Dkt. 156).

IT IS SO ORDERED this \_\_\_\_th day of October 2023 at \_\_\_\_\_.

BY THE COURT:

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ROBERT J. SHELBY

United States Chief District Judge